

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LINDA L. MACK (a/k/a LYNNE L. MACK)	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 C 3127
	)	
BARRY S. MARAM, in his official capacity as Director of the Illinois Department of Healthcare and Family Services; and	)	Judge Kennelly
	)	Magistrate Judge Cox
CAROL L. ADAMS, in her official capacity as Secretary of the Illinois Department of Human Services,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND HER VERIFIED  
COMPLAINT AND FILE HER FIRST AMENDED COMPLAINT**

NOW COMES Plaintiff, LINDA L. MACK (a/k/a LYNNE L. MACK), by and through her attorneys, STEVEN C. PERLIS and HELEN MESOLORAS, attorneys with the ELDER LAW OFFICE OF STEVEN C. PERLIS & ASSOCIATES, P.C., and pursuant to Rule 15(a) and specifically Rule 15(a)(2) of the Federal Rules of Civil Procedure, hereby requests that this Honorable Court give Plaintiff leave to amend her Verified Complaint received May 30, 2008, and file her First Amended Complaint. This amended pleading seeks to narrow the issues and may streamline these proceedings.

STEVEN C. PERLIS  
HELEN MESOLORAS  
ELDER LAW OFFICE OF STEVEN C. PERLIS  
& ASSOCIATES, P.C  
3345 N. Arlington Heights Road, Suite D  
Arlington Heights, Illinois 60004  
Telephone 847-818-1138  
e-mail: [steve@perliselderlaw.com](mailto:steve@perliselderlaw.com)  
[helen@perliselderlaw.com](mailto:helen@perliselderlaw.com)

Respectfully submitted,

LINDA L. MACK  
(a/k/a LYNNE L. MACK), Plaintiff

By: /s/ Steven C. Perlis  
Attorney for Plaintiff

Dated: August 25, 2008

**CERTIFICATE OF SERVICE**

STEVEN C. PERLIS, one of the attorneys of record for Plaintiff Linda L. Mack (a/k/a Lynne L. Mack), hereby certifies that he caused a copy of the foregoing **PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND HER VERIFIED COMPLAINT AND FILE HER FIRST AMENDED COMPLAINT** to be served by the Court's ECF/electronic mailing system upon the following:

John E. Huston  
Christopher S. Gange  
Assistant Attorneys General  
160 N. LaSalle Street, Suite N-1000  
Chicago, Illinois 60601

James A. Lang  
Assistant Attorney General  
100 W. Randolph St., 13<sup>th</sup> Fl.  
Chicago, IL 60601

/s/ Steven C. Perlis